



August 08, 2008
NewFields Project No. 0219-018-900
VIA FED-EX

Ms. Nicole LaFranchise
Mr. David Ashton
Port of Portland
121 NW Everett St.
Portland, OR 97209

Subject: *Revised Level I Scoping Ecological Risk Assessment, Swan Island Upland Facility, Operable Unit 1*

Dear Ms. LaFranchise and Mr. Ashton:

Enclosed please find four printed copies and one electronic copy of the document text (10 pages) for the revised *Level I Scoping Ecological Risk Assessment, Swan Island Upland Facility, Operable Unit 1, Portland, Oregon*. We understand that the Port will submit the requisite copies to Oregon DEQ. This report has been revised based on comments from DEQ, contained in a letter from Jennifer Sutter on July 1, 2008.

In its comment letter, DEQ agreed with the overall conclusion of the Level I Scoping Ecological Risk Assessment (ERA) that there are no unacceptable risks to upland receptors by contamination at the Swan Island Upland Facility (SIUF). However, DEQ requested an addendum to the report summarizing site data that supports the statement made in Section 2.1 regarding lack of soil hot spots considering ecological screening criteria. Rather than provide an addendum, we are submitting a revised Level I Scoping ERA.

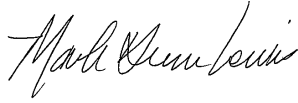
The original version of the Level I Scoping ERA document mistakenly included the following statement in Section 2.1: "Initial screening of the analytical results did not lead to the identification of soil hotspot locations in either sampling area." The *Phase II Remedial Investigation Work Plan Addendum for Operable Unit 1, Swan Island Upland Facility, Portland, Oregon* (Bridgewater Group, Inc. 2007) included a preliminary hot spot analysis based on human health criteria, and the statement on the conclusions was erroneously included in the Level I Scoping ERA. This statement has been deleted from the revised document because a hot spot evaluation is not necessary or pertinent for the DEQ Level I Scoping-level evaluation.

According to DEQ guidelines, the main goal of a Level I Scoping ERA is to determine whether ecological receptors and/or exposure pathways are present. A hot spot evaluation would only be relevant if there were reason to believe that there were significant ecological resources and/or complete exposure pathways at the facility. The SIUF Level I Scoping ERA evaluates ecological site conditions and concludes that there

are no significant ecological resources and that exposure pathways are incomplete (or extremely limited). DEQ has agreed with this conclusion. Therefore, a hot-spot evaluation is not necessary.

Please do not hesitate to call me at 303-442-0267 or Beckie Rawlinson at 406-728-1732 if you have any questions. Thank you.

Sincerely,
NEWFIELDS

A handwritten signature in cursive script that reads "Mark Dunn Lewis".

Mark Dunn Lewis
Contract Project Lead

Enclosures

cc: Michael Pickering, Ash Creek Associates (1 printed copy)
Stu Brown, Bridgewater Group, Inc. (1 printed copy)